



A Pennsylvania Professional Corporation
ATTORNEYS AT LAW
www.finemanlawfirm.com

PHILADELPHIA OFFICE

Ten Penn Center
1801 Market Street, Suite 1100
Philadelphia, PA 19103
(215) 893-9300
Fax: (215) 893-8719

RICHARD J. PERR
Direct Dial: (215) 893-8724
E-Mail: rperr@finemanlawfirm.com

NEW JERSEY OFFICE

20 Brace Road
Suite 350
Cherry Hill, NJ 08034
(856) 795-1118
Fax: (856) 795-1110

Please Reply to Philadelphia Office

November 26, 2018

Via ECF

The Honorable Steven L. Tiscione
Magistrate Judge, U.S.D.C., E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Libby Stoessel, individually and on behalf of all others similarly situated v. Client Services, Inc., et al.
U.S.D.C. E.D.N.Y. No. 1:18-cv-04659-ILG-ST
Our File No. 1479/00004

Dear Judge Tiscione:

I represent Defendant, Client Services, Inc. ("Defendant"), in the above-matter. I am writing this letter to request an adjournment of the Initial Conference that is scheduled for Monday, December 3, 2018, at 10:00 a.m. (Doc. 5). I am requesting this adjournment because I was retained very recently by Defendant, and I am scheduled to be out of town that day attending previously scheduled client meetings in Sarasota, Florida. Counsel for Plaintiff, Libby Stoessel, has no objection to this request. This is the first request for an adjournment.

Your Honor requires that a representative from Defendant with full settlement authority attend the Initial Conference in-person. (Doc. 5). Defendant respectfully requests that its representative be permitted to attend the Initial Conference via telephone because the representative works in St. Charles, Missouri. I would attend the Initial Conference in-person. Counsel for Plaintiff has no objection to Defendant's representative appearing via telephone.

The parties have conferred and propose that the Initial Conference be rescheduled for December 17 or 18, 2018. The parties will submit their ex parte settlement position letters by the original November 29, 2018 deadline. (Doc. 5).

The Honorable Steven L. Tiscione
November 26, 2018
Page 2

Wherefore, Defendant respectfully requests that Your Honor adjourn the December 3, 2018 Initial Conference and permit Defendant's representative to attend the rescheduled Initial Conference via telephone.

Respectfully,

/s/ Richard J. Perr
Richard J. Perr

cc: Daniel Kohn, Esquire (via ECF)